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Tina Shaughnessy

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Tina Shaughnessy,	)	<b>Case No.:</b>
	)	
Plaintiff,	)	<b>COMPLAINT AND DEMAND FOR</b>
	)	<b>JURY TRIAL</b>
v.	)	
	)	<b>(Unlawful Debt Collection Practices)</b>
Frontier Financial Group and Associates,	)	
	)	
Defendant.	)	

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**PLAINTIFF'S COMPLAINT**

TINA SHAUGHNESSY (Plaintiff), through attorneys, KROHN & MOSS, LTD., alleges the following against FRONTIER FINANCIAL GROUP AND ASSOCIATES (Defendant):

**INTRODUCTION**

- Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, *15 U.S.C. 1692 et seq.* (FDCPA).

**JURISDICTION AND VENUE**

- Jurisdiction of this court arises pursuant to *15 U.S.C. 1692k(d)*, which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."
- Defendant conducts business in the state of Arizona, and therefore, personal jurisdiction is established.
- Venue is proper pursuant to *28 U.S.C. 1391(b)(2)*.

**PARTIES**

5. Plaintiff is a natural person residing in Surprise, Maricopa County, Arizona.
6. Plaintiff is a consumer as that term is defined by *15 U.S.C. 1692a(3)*, and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by *15 U.S.C. 1692a(5)*.
7. Defendant is a debt collector as that term is defined by *15 U.S.C. 1692a(6)*, and sought to collect a consumer debt from Plaintiff.
8. Defendant is a collection agency and conducts business in Arizona.
9. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

**FACTUAL ALLEGATIONS**

10. Defendant places collection calls to Plaintiff seeking and demanding payment for an alleged debt originally owed to a bank for a credit card.
11. Defendant calls Plaintiff from 877-600-2155 extension 242.
12. Defendant threatened to garnish Plaintiff's wages if she did not pay Defendant.

**COUNT I  
DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT**

13. Defendant violated the FDCPA based on the following:
  - a. Defendant violated §1692e of the FDCPA by making false, deceptive, and misleading representations in connection with the debt collection.
  - b. Defendant violated §1692e(4) of the FDCPA threatening to garnish Plaintiff's wages.

WHEREFORE, Plaintiff, TINA SHAUGHNESSY, respectfully requests judgment be entered against Defendant, FRONTIER FINANCIAL GROUP AND ASSOCIATES, for the following:

1 14. Statutory damages of \$1000.00 pursuant to the Fair Debt Collection Practices Act, *15*  
2 *U.S.C. 1692k*,

3 15. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act,  
4 *15 U.S.C. 1692k*

5 16. Any other relief that this Honorable Court deems appropriate.

6 **DEMAND FOR JURY TRIAL**

7 Plaintiff, TINA SHAUGHNESSY, demands a jury trial in this cause of action.

8 RESPECTFULLY SUBMITTED,

9 DATED: August 10, 2011

KROHN & MOSS, LTD.

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11 By: /s/ Ryan Lee

12 Ryan Lee  
13 Attorney for Plaintiff  
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24 **VERIFICATION OF COMPLAINT AND CERTIFICATION**

25 STATE OF ARIZONA

**VERIFICATION OF COMPLAINT AND CERTIFICATION**

STATE OF ARIZONA

Plaintiff, TINA SHAUGHNESSY, states as follows:

1. I am the Plaintiff in this civil proceeding.
2. I have read the above-entitled civil Complaint prepared by my attorneys and I believe that all of the facts contained in it are true, to the best of my knowledge, information and belief formed after reasonable inquiry.
3. I believe that this civil Complaint is well grounded in fact and warranted by existing law or by a good faith argument for the extension, modification or reversal of existing law.
4. I believe that this civil Complaint is not interposed for any improper purpose, such as to harass any Defendant(s), cause unnecessary delay to any Defendant(s), or create a needless increase in the cost of litigation to any Defendant(s), named in the Complaint.
5. I have filed this Complaint in good faith and solely for the purposes set forth in it.
6. Each and every exhibit I have provided to my attorneys which has been attached to this Complaint is a true and correct copy of the original.
7. Except for clearly indicated redactions made by my attorneys where appropriate, I have not altered, changed, modified or fabricated these exhibits, except that some of the attached exhibits may contain some of my own handwritten notations.

Pursuant to 28 U.S.C. § 1746(2), I, TINA SHAUGHNESSY, hereby declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.

DATE:

7-28-2011

Tina M. Shaughnessy  
TINA SHAUGHNESSY